



U.S. Department of Justice

United States Attorney
Eastern District of New York

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August 16, 2022

By ECF and Email

The Honorable Eric R. Komitee
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Tyreik Jackson
Criminal Docket No. 20-476 (S-1) (ERK)

Dear Judge Komitee:

The government respectfully submits this letter in response to the August 12, 2022 letter submitted by *Inner City Press* regarding the sealing of Government Exhibit 16 ("GX 16"). For the reasons stated in the government's August 11, 2022 motion, the government submits that sealing of GX 16 is appropriate.

Contrary to *Inner City Press*'s contention, the government is not seeking to seal the government's sentencing memorandum (ECF No. 101). Indeed, that document is currently publicly available on the docket. Nor is the government contesting that the government's sentencing memorandum or the exhibits thereto are "judicial documents." See ECF No. 105 ("The government does not contest that 'a party's sentencing submission is a judicial document.'") Rather, the government is only seeking to seal GX 16, which depicts the victim of the defendant's crime (the "Victim") and two other individuals—an adult woman (the "Adult Woman") and a young child (the "Young Child")—who are closely linked to the Victim. For the reasons stated in the government's motion, see ECF No. 105, sealing of GX 16 is appropriate under these circumstances.

As also noted in the government's motion, should the Court be inclined to unseal GX 16, the government would request permission to file a redacted version of GX 16 that conceals the identities of the Victim, Adult Woman and Young Child. It does not appear that *Inner City Press* would object to this limited redaction of GX 16. See ECF No. 108 ("This is a

request to the Court that it docket and unseal, **if necessary in partially redacted form**, Exhibit 16 to the Sentencing Memo.”) (emphasis added).

Respectfully submitted,

BREON PEACE
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cc: Clerk of the Court (ERK) (by ECF)
Sam Schmidt, Esq. (by ECF)